

To: Maier, Brent[Maier.Brent@epa.gov]
Cc: Montgomery, Michael[Montgomery.Michael@epa.gov]
From: Albright, David
Sent: Tue 10/13/2015 3:22:10 PM
Subject: CA UIC Program: Congressional and State Legislative Staff calls

Hi Brent,

It does look like Mike will be able to participate in these calls at this time (Th. 10/15 from 10am-12pm pacific). As you requested, here is a brief description that you can forward along regarding the subject of the calls. Thanks, David

CA UIC Program Update

Over the last year, EPA has conducted enhanced oversight of the CA Division of Oil and Gas and the State Water Board to address deficiencies in the State's implementation of the Class II Underground Injection Control (UIC) Program. As part of our oversight effort, in March 2015 EPA and the State agreed to a Compliance Plan setting out a schedule of required activities and deliverables, with target milestones and compliance deadlines to ensure that the State continues to make progress towards full compliance with the SDWA, and meets a February 15, 2017 compliance deadline for Class II wells currently injecting into non-exempt aquifers. One of the initial deadlines in the Plan's schedule is an October 15, 2015 deadline for shut-in of any disposal wells that are injecting into non-exempt, non-hydrocarbon-bearing aquifers with total dissolved solids levels below 3,000 mg/l TDS. The State has identified the wells that are subject to this shut-in, notified the operators, and they will send staff on October 16th to inspect the affected wells and confirm they are shut-in. EPA will provide an update on this effort and the status of other efforts under the Compliance Plan.

In addition, on October 8, 2015, CA Division of Oil, Gas and Geothermal Resources released a 2015 Underground Injection Control Program Report to the California Legislature, as required by CA Senate Bill 855. The Report addresses a number of key elements regarding UIC program implementation for the period 2011-2014, and includes a detailed program assessment of issues with the UIC program focused on District 1 (Cypress, CA - Los Angeles Basin). The Report appears to be a thorough account of past practices and shortcomings of the State's Class II UIC Program, along with numerous recommendations for program improvement. As we continue our enhanced oversight of the CA UIC program, EPA will urge DOGGR and the State Board to fully evaluate the implications of these new findings on the current UIC Compliance Plan, and we will establish the necessary supplemental requirements to the Plan to assure protection of drinking

water resources and full compliance with state and federal UIC requirements. EPA will discuss the next steps for working with the State to address the Report findings.

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